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12 *Attorneys for the United States*

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 Sarah Ziegler,

16 Plaintiff,

17 v.

18 Thomas J. Vilsack, Secretary United States
 19 Department of Agriculture, Agricultural
 20 Research Service; Lawrence Chandler, an
 21 Individual, Alfonso Clavijo, an Individual,

22 Defendants.

23 Case No. 2:24-cv-01167-JAD-MDC

24 **Stipulation to Extend United States'**
 25 **Deadline to File Response to Plaintiff's**
 26 **Complaint**

27 **(First Request)**

28 Plaintiff, Sarah Ziegler, through counsel and the United States of America, on
 29 behalf of Federal Defendants, through undersigned counsel, hereby agree and stipulate to
 30 extend the deadline to file a responsive pleading to Plaintiff's Complaint from January 13,
 31 2025 to January 24, 2025. The parties enter into this stipulate based on the following:

32 1. Plaintiff filed the Complaint on June 26, 2024 (ECF No. 1).

33 2. Plaintiff served the United States with a copy of the Summons and

34 Complaint on November 12, 2024.

35 3. The current deadline for the United States to respond to the Plaintiff's
 36 Complaint is January 13, 2025.

37 Plaintiff and the United States, through undersigned counsel, agree and stipulate
 38 that the United States' time to respond to the Plaintiff's Complaint shall be extended to
 39 January 24, 2025. This is the first request for an extension of time.

1 The extension of time is necessary for the United States' counsel to review the
2 relevant information relating to the alleged employment discrimination and coordinate its
3 response to the allegations in Plaintiff's complaint with the Department of Agriculture.

4 Therefore, the parties request that the Court extend the deadline for the United
5 States to file a responsive pleading to Plaintiff's Complaint to January 25, 2025.

6 This stipulated request is filed in good faith and not for the purpose of undue delay.

7 Respectfully submitted this 13th day of January 2025.

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/s/ Jenny L. Foley
10 JENNY L. FOLEY, ESQ.
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12 Las Vegas, Nevada 89121

13 *Attorney for Plaintiff*

JASON M. FRIERSON
United States Attorney

/s/ Karissa D. Neff
KARISSA D. NEFF
13 Assistant United States Attorney

Attorneys for the United States

14 **IT IS SO ORDERED:**

15 
16 Hon. Maximiliano D. Couvillier III
17 UNITED STATES MAGISTRATE JUDGE
18 DATED: 1/14/2025

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